

Mr. Anthony C. Sullivan  
Barnes & Thornburg  
11 South Meridian Street  
Indianapolis, IN 46204-3535

Re: 157-15825-00032  
Review Response  
**Part 70 157-6960-00032**

Dear Mr. Sullivan:

Rea Magnet Wire Company was issued a Part 70 permit (T157-6960-00032) on February 18, 1999, for a magnet wire coating process operation located at 2800 Concord Road, Lafayette, Indiana 47905. A letter was received on April 5, 2002, requesting a modification of Condition D.1.5(b) to eliminate compliance testing of the V-12 ovens this year and restore annual testing in the future if the ovens remain operational.

IDEM agreed to lessen the testing frequency for the ovens in section D.1 in Significant Permit Modification 157-11787-00032 issued February 20, 2001, from annually to once every two and one-half (2 ½) years after the most recent test demonstrating compliance. Although some of the V-12 ovens have been removed, it is uncertain that all the ovens will be removed by the end of this year.

Condition D.1.5 is not being revised and will remain as currently stated in the permit:

D.1.5 Testing Requirements [326 IAC 2-7-6(1), (6)]

- (a) Within 6 months after issuance of this permit, the Permittee shall perform VOC testing utilizing Methods 25 (40 CFR 60, Appendix A) for VOC, or other methods as approved by the Commissioner.
- (b) A representative oven from Group 1 shall be tested using the worst case coating once every two and one-half (2½) years after the most recent test demonstrating compliance. Upon failure of a test, the same oven shall replace the catalyst as scheduled, and be retested after 3,650 operating hours, but before reaching 4,380 operating hours.
- (c) Additionally, the oven tested must be an oven that has not had the catalyst replaced within the last 3,650 operating hours.
- (d) Group 1 consists of the following ovens: 365-366, 367-368, 369-370, 371-372, 381-382 and 383-384.

Therefore, testing is required and all conditions in the Part 70 permit will remain the same. If there are ovens still in operation when the test is due or the ovens have started back up at a later date, the testing will be required. The request to test annually if any ovens remain operational is not an acceptable option because by that time the testing schedule would have been delayed significantly.

If you have any questions on this matter please contact Janet Mobley at 317/232-8369 or 1-800-451-6027 press 0 and ask for ext. 2-8369. For questions regarding testing please contact Steve Friend of the Compliance Data Section at 317/233-3438, or 1-800-451-6027 press 0 and ask for ext. 3-3438.

Sincerely,

Paul Dubenetzky, Chief  
Permits Branch  
Office of Air Quality

PD/jm

cc: File - Tippecanoe County  
Tippecanoe County Health Department  
Air Compliance Section Inspector - Jim Thorpe  
Compliance Data Section - Karen Nowak  
Permit Review Section II - Janet Mobley  
Rea Magnet Wire Company